

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

Rachel Schmeltz
Energy Star Program Manager
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Schmeltz,

The California Energy Commission appreciates the opportunity to provide comments on the proposed ENERGY STAR furnace specification, V2.0-Draft 1. These comments represent my own thinking, but I believe would also represent the perspective of many efficiency advocates.

Einstein's precept was that explanations should be as simple as possible, but not simpler. I think that applies here: A house in Miami or Palm Springs will probably have some kind of furnace, but it's seldom used for heating. A furnace with an efficient fan makes very good sense there, but what would be the point of a condensing furnace? Another house in the mountains at Lake Tahoe may need that efficient furnace but is not so sensitive to fan efficiency.

Therefore, I believe there should be a specification for heating efficiency, something like the proposed CEE specification, and a separate specification for cooling efficiency, which reflects fan system energy use at realistic flows and pressures. In this way people can use the Energy Star specification to make choices based on their particular situation, and a very modest increase in complexity will provide extremely valuable guidance on appliance choices.

Sincerely,

A handwritten signature in cursive script that reads "Chris Scruton".

Chris Scruton
Mechanical Engineer
Public Interest Energy Research Program
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